

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LINDA CAMPBELL-HICKS, individually
and on behalf of all others
similarly situated,

Plaintiff,
-against-

ANSWER
14-CV-3576

C.TECH COLLECTION, INC.,
Defendant.

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Defendant, C.TECH COLLECTION, INC., by its attorney, Arthur Sanders, Esq., answers plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair Debt Collection Practices Act (FDCPA), but denies any violation thereof.

2. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "2" of the complaint.

3. Defendant admits the allegations contained in paragraph "3" of the complaint.

4. Defendant admits the allegations contained in paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.

10. Defendant admits the allegations contained in paragraph "10" of the complaint.

11. Defendant admits the allegations contained in paragraph "11" of the complaint.

12. Defendant admits the allegations contained in paragraph "12" of the complaint.

13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "17" of the complaint

18. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "18" of the complaint.

19. Defendant admits the allegations contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant admits the allegations contained in paragraph "22" of the complaint.

23. Defendant admits the allegations contained in paragraph "23" of the complaint.

24. Defendant denies that a class action is appropriate and preferable in this matter.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. This paragraph contains no factual allegations directed against the defendant and requires no admission or denial.

27. This paragraph contains no factual allegations directed against the defendant and requires no admission or denial.

28. This paragraph contains no factual allegations directed against the defendant and requires no admission or denial.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. This paragraph contains no factual allegations directed against the defendant and requires no admission or denial.

32. Defendant repeats and realleges its previous admissions and denials contained in paragraphs "1" through "31" of the complaint.

33. Defendant denies each and every allegation contained in paragraph "33" of the complaint.

34. Defendant denies each and every allegation contained in paragraph "34" of the complaint.

35. Defendant denies each and every allegation contained in paragraph "35" of the complaint.

36. Defendant denies each and every allegation contained in paragraph "36" of the complaint.

37. Defendant denies each and every allegation contained in paragraph "37" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY
July 15, 2014

/S/ARTHUR SANDERS

ARTHUR SANDERS, ESQ.
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TO:

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